

BRAFMAN & ASSOCIATES, P.C.

ATTORNEYS AT LAW

767 THIRD AVENUE, 26TH FLOOR

NEW YORK, NEW YORK 10017

TELEPHONE: (212) 750-7800

FACSIMILE: (212) 750-3906

E-MAIL: ATTORNEYS@BRAFLAW.COM

BENJAMIN BRAFMAN

MARK M. BAKER
OF COUNSEL

MARC A. AGNIFILO
OF COUNSEL

ANDREA L. ZELLAN
JOSHUA D. KIRSHNER
JACOB KAPLAN
TENY R. GERAGOS
ADMITTED IN NY & CA
STUART GOLD

December 13, 2019

The Honorable Gregory H. Woods
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Natalie Mayflower Sours Edwards, 19 Cr. 64 (GHW)

Dear Judge Woods:

We represent the defendant in the above-referenced case. Under the current schedule, both the government and defense must file their motions *in limine* and other pretrial materials (including requests to charge, proposed verdict forms, and proposed *voir dire*) by Friday, December 20, 2019. Counsel has recently informed the government, however, that the defense is likely to assert a public-authority defense at trial. This defense will have significant effect on the nature of the motions *in limine* and other pretrial materials that the parties will need to file. Consequently, with the consent of the government, counsel is respectfully requesting an adjournment of the current pretrial deadlines. This adjournment will also provide the parties with sufficient time to continue the productive discussions relating to a potential disposition of this matter and to address any possible discovery or other issues relating to the potential superseding indictment that the government raised at the last court appearance. Accordingly, the parties propose the following modification of the motion schedule:

- December 23, 2019: counsel must provide the government with written notice, consistent with Federal Rule of Criminal Procedure 12.3, as to whether the defense intends to assert a public-authority defense at trial and the nature of that defense;
- January 21, 2020: motions *in limine* and other pretrial materials due;
- February 3, 2020: response to motions *in limine* due;
- February 7, 2020: replies to motions *in limine* due.

Respectfully submitted,

Jacob Kaplan
Jacob Kaplan, Esq.

cc: Government Counsel (Via ECF)